

PAI Entity Statement 2023 Formue

PAI Entity Statement

Financial market participant
Formue Norge AS

Summary

Formue Norge AS (Legal Entity Identifier 549300KW8UGXZ5QYQS79) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Formue Norge AS.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

A Principal Adverse Impact (PAI) is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social concerns, respect for human rights and anti-corruption.

Where data is available, we use quantitative analyses to monitor the portfolio's exposure to adverse impacts. Such analyses are a basis for follow-up of asset managers with whom we invest our clients' capital, and we actively use ownership to influence managers towards process improvement. We prioritize continuous improvement in data access and quality.

Many types of economic activity have the potential to impact sustainability factors, and the indicators are a way of measuring this impact. Table 1 of this disclosure shows that our investment decisions cause adverse impacts on sustainability factors. We believe access to data and improvements in data coverage are important in our work to reduce impacts, and we manage the adverse impacts on sustainability factors through engagement with the asset managers with whom we invest our clients' capital. You can read more about the impacts, actions taken to reduce the impacts, policy to address the impacts and engagement strategy in the statement below.

Published 30.06.2024

Principal adverse sustainability impacts statement

INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Greenhouse Gas Emissions							
1. GHG Emissions	GHG Emissions - Scope 1	54,205	66.9%	58,795	70.4%	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2) weighted by the portfolios' value of investment in a company and by the company's most recently available enterprise value including cash.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	GHG Emissions - Scope 2	13,315	67.0%	13,036	70.5%	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2) weighted by the portfolios' value of investment in a company and by the company's most recently available enterprise value including cash.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	GHG Emissions - Scope 3	358,302	67.0%	444,779	70.5%	Sum of portfolio companies' Carbon Emissions - Estimated Scope 3 (tCO2) weighted by the portfolios' value of investment in a company and by the company's most recently available enterprise value including cash.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	Total GHG Emissions	424,546	67.0%	513,943	70.5%	Total annual GHG emissions across scope 1, scope 2 and estimated scope 3 associated with the market value of the portfolio.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
2. Carbon footprint	Carbon footprint	378	67.0%	382	70.5%	Total annual GHG emissions across scope 1, scope 2 and estimated scope 3 associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash)	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
3. GHG intensity of investee company	GHG Intensity of investee companies	321	76.6%	819	78.8%	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue)	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	5.2%	77.7%	5.5%	80.0%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and production	78%	75.4%	77%	77.9%	The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
6. Energy consumption per high impact sector	NACE Code A (Agriculture, Forestry and Fishing)	2.1	66.6%	1.2	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code A	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	NACE Code B (Mining and Quarrying)	20.5	66.6%	2.6	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code B	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	NACE Code C (Manufacturing)	1.3	66.6%	1.1	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code C	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
NACE Code D (Electricity, Gas, Steam and Air conditioning supply)		10.5	66.6%	8.7	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code D	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
NACE Code E (Water Supply, Sewerage, Waste Management and Remediation Activities)		0.8	66.6%	0.7	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code E	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
NACE Code F (Construction)		0.3	66.6%	0.4	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code F	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
NACE Code G (Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles)		0.4	66.6%	0.5	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code G	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
	NACE Code H (Transportation and Storage)	2.2	66.6%	1.8	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code H	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
	NACE Code L (Real Estate Activities)	3.5	66.6%	2.8	69.7%	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code L	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
7. Activities negatively affecting biodiversity sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	0.1%	77.4%	0.1%	79.5%	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Water							
8. Emissions to water [number seems too high, factor of 10 or even 100]	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	208.3	7.6%	236.0	7.3%	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
Waste							
9. Hazardous waste ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	2.5	43.4%	5.0	43.7%	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Social and employee matters							
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.4%	77.8%	0.3%	80.1%	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance / complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	36.8%	77.3%	35.3%	79.4%	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	13.7%	61.8%	13.5%	63.9%	The portfolio holding's weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
13. Board gender	Average ratio of female to male board members in investee companies	35.4%	76.6%	36.9%	78.9%	The portfolio holding's weighted average of the ratio of female to male board members.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture of selling of controversial weapons	0.1%	77.7%	0.1%	80.0%	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, duster munitions, chemical or biological weapons Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Environmental							
15. GHG Intensity	GHG intensity of investee countries	547	85.8%	434	87.8%	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP)	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.
Social							
16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	6	89.1%	2	89.7%	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

Principal adverse sustainability impacts statement

INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Emissions							
4. Investments in companies without carbon emissions reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	31.1%	76.5%	35.6%	78.7%	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

Principal adverse sustainability impacts statement

ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse Sustainability Indicator	Metric	2022		2023		Explanation	Action taken
		Impact	Coverage	Impact	Coverage		
Human rights							
9. Lack of a human rights policy	Share of investments in entities without a human rights policy	10.7%	77.7%	7.6%	79.9%	The percentage of the portfolio's market value exposed to issuers without a formal human rights policy.	PAI data collected from data vendors, fund manager surveys and reporting are combined and used to engage with fund managers to engender adverse impact improvements in underlying investments on a 2-3 year horizon. A request for transition planning, including SBTi applications, is prioritized in fund investments which comprise listed company equity or debt instruments.

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DESCRIPTION OF POLICIES TO IDENTIFY AND PRIORITIZE PRINCIPAL ADVERSE SUSTAINABILITY IMPACTS

The identification and prioritization of principal adverse impacts on sustainability factors are described in the sustainability appendix to the firm's principal investment policy set out by the board of directors to govern the work of the Investment Research Department. The board of directors approved the latest update of the investment policy on 24.06.2024.

It is included in the role of the Chief Investment Officer to put the investment policy into practice, and hereunder, delegate responsibility for specific investment or functional areas to senior employees of the Investment Research Department, including having oversight of sustainability work generally as well as managing principal adverse sustainability impact processes.

Formue invests client assets exclusively in commingled vehicles (funds and partnerships). In general, several such third-party managed funds or partnerships are grouped together in fund-of-fund portfolios. It is therefore difficult to rely on manager sustainability data alone, as coverage levels and methodologies vary between managers, and Formue has instead made the decision to acquire principal adverse impact sustainability data at the underlying equity and bond level from a recognized third-party vendor. Depending on the level of data coverage, Formue will therefore in principle be able to consider and report on principal adverse impacts on sustainability factors in each public equity and fixed income fund and fund-of-funds portfolio that is made available to clients.

As the third-party data vendor has coverage across all principal adverse impact factors, Formue has in principle been able to consider all factors. Given the mandates that govern public equities and fixed income at Formue, the company has chosen to analyze principal adverse impact factors relative to benchmark proxies for a given asset class. Factors will therefore be highlighted when they show a larger negative impact than a relevant index, which in turn indicates a higher likelihood of this impact occurring. Nevertheless, there are at this time lower levels of data coverage for certain factors, which may cause Formue to put less emphasis on such factors until data coverage is deemed to be sufficiently high.

In its sustainability work, Formue has chosen to place greatest emphasis on GHG emission reductions. This will be seen in our reporting on improvement over time in the following Principal Adverse Impact indicators related to GHG emissions:

- GHG emissions (Scope 1, 2, 3 and total)
- Carbon footprint
- GHG intensity of investee companies
- Exposure to companies active in the fossil fuel sector
- Share of non-renewable energy consumption and production
- Country GHG intensity of sovereign issuers

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DESCRIPTION OF POLICIES TO IDENTIFY AND PRIORITIZE PRINCIPAL ADVERSE SUSTAINABILITY IMPACTS

Other areas of focus for reporting on principal adverse impact sustainability factors include corporate governance, human rights and certain aspects related to employees.

Formue believes a process of engagement with the chosen fund managers may result in incremental positive change. This approach rests on a belief that transition not only is important, but also necessary. As a basis for the engagement dialogue, Formue uses, inter alia, data on principal adverse sustainability impacts.

We use MSCI's EU Sustainable Finance Module which covers the principal and additional adverse sustainability impact indicators for over 10,000 corporate equity and fixed income issuers in addition to over 175 sovereign issuers or countries. Data sources include company direct and indirect disclosures, as well as direct communication with companies. In cases where company disclosure is unavailable, estimated metrics based on other MSCI ESG Research datasets are suggested. Data quality is ensured through various quality checks, including dual vendor validation and keyword scans. Data processing involves multiple layers of validation and governance committees provide oversight. Ongoing monitoring and updates to the dataset are based on source updates and the standard review cycle of MSCI ESG Research proprietary datasets. Corporate actions such as acquisitions, mergers, and spinoffs are also incorporated into the analysis. Company communication allows issuers to review data, provide feedback, and engage with MSCI ESG Research.

The calculations that result in the aggregated portfolio PAI values for each indicator are based on the MSCI SFDR Adverse Impact Metrics Calculation Guide. The identified margins of error that can affect the methodology described above are related to:

- Low coverage - the part of portfolio covered results in aggregated PAI value that is not representative for the total portfolio.
- Error in received PAI data - the data received from MSCI is incorrect and therefore results in wrong aggregated PAI values.
- Error in received holdings data - the holdings data received from Bloomberg is incorrect and therefore results in wrong aggregated PAI values.
- Misinterpretation of methodology - our interpretation of the methodology is incorrect resulting in incorrect aggregated PAI values

Certain data for 2022 originally shown in the 2022 Entity Statement has in 2023 been restated to account for errors.

Principal adverse sustainability impacts statement

REFERENCES TO INTERNATIONAL STANDARDS

Formue has, as one of its principal objectives, alignment with the Paris Agreement across its operations and investments. In addition to the Sustainable Finance Disclosure Regulation (SFDR) we will report according to an array of voluntary business conduct codes and internationally recognised standards for reporting:

- (1) The United Nations Principles for Responsible Investment
- (2) The Science Based Target initiative
- (3) The Taskforce for Climate Related Financial Disclosures

Within investments, as described above, the key characteristic we target is reduction in GHG emissions, and the associated PAIs. In addition, we will report on the share of portfolio companies with approved Science Based Targets (SBTi) and the share of portfolio companies with carbon emission reduction plans. This will be done at the aggregate level but we will use fund-level data to engage with the respective fund managers about progress towards Paris alignment. By flagging funds and investee companies where the PAI score for the above factors is deteriorating, or where there are clear hotspots, we are able to target our engagement with the relevant fund managers and try to catalyze positive change. The data source for the above is MSCI, initially just for liquid assets (equities and bonds excluding sovereign debt). (Please see section 2 above for more information about MSCI sources). We have access to a range of data relevant to other asset classes (Burgiss for Private Equity, GRESB for Real Estate) but it generally lacks consistency for reporting on the above KPIs at this stage. We do not use a forward-looking climate scenario to drive our investment decisions, but our commitment to the SBTi means we aim to have 100% coverage of the portfolio with Paris-aligned Net Zero targets (to 2050) by 2040 (compared with 23% coverage for the assets in scope at the end of our chosen baseline year of 2022). We certainly do not believe climate scenarios are irrelevant and will be reporting in more detail under TCFD in the future. Given limited data for unlisted assets, notably hedge funds, these scenarios would have limited use as an indicator for a client's entire portfolio.

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ENGAGEMENT POLICIES

Formue does not invest directly in companies but instead exclusively through funds or partnerships managed by third-party asset managers. Directive 2007/36/EC (as amended in 2022) as it applies to institutional investors or asset managers is not directly relevant.

Formue does nevertheless engage with the managers that have been chosen, and has developed guidelines for this engagement work. These guidelines are referenced in the Investment Policy governing the work of the Investment Research Department at Formue.

Below is set out a brief summary of the manager engagement process:

- Sustainability risk and opportunity factors are integrated into the investment process, and are therefore the responsibility of each asset class team together with the evaluation, analysis and follow-up generally
- A sustainability summary including a ranking of the manager is presented to the investment committee, together with areas identified as having potential for improvement
- Key parts of the summary and the areas of improvement are also logged in a CRM system
- Asset class teams will cover areas of improvement with managers in the on-going follow-up, monitoring and engagement process, and annual updates will formally be logged
- If the necessary improvements in investment approach and/or PAI score are not realised within a reasonable period of time, we will cease investing in the asset manager
- The asset class teams covering listed equities and fixed income will additionally use a proprietary dashboard tool to analyze principal adverse impacts on sustainability factors at the level of individual stocks or bonds, both for fund-of-fund aggregates and individual underlying funds. This analysis will form part of the basis for the engagement meetings with relevant managers